

KRAVITZ SCHNITZER JOHNSON
WATSON & ZEPPENFELD, CHTD.
8985 S. Eastern Ave., Ste. 200
Las Vegas, Nevada 89123
(702) 362-6666

MARTIN J. KRAVITZ, ESQ.
Nevada Bar No. 83
L. RENEE GREEN, ESQ.
Nevada Bar No. 12755
KRAVITZ SCHNITZER JOHNSON
WATSON & ZEPPENFELD, CHTD.
8985 So. Eastern Avenue, Suite 200
Las Vegas, Nevada 89123
Telephone: (702) 362-6666
Facsimile: (702) 362-2203
mkraivtz@ksjattorneys.com
rgreen@ksjattorneys.com

*Attorneys for Defendants,
ACCESS MEDICAL, LLC and
ROBERT "SONNY" WOOD*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

NAUTILUS INSURANCE COMPANY,

Case No.: 2:15-cv-00321-JAD- BNW

Plaintiff,

vs.

ACCESS MEDICAL, LLC; ROBERT
CLARK WOOD, II; FLOURNOY
MANAGEMENT, LLC; and DOES 1-10,
inclusive,

Defendants.

MOTION AND PROPOSED ORDER TO WITHDRAW AS COUNSEL OF RECORD

MARTIN J. KRAVITZ, ESQ. and L. RENEE GREEN, ESQ., respectfully move this court for an order permitting Martin J. Kravitz, Esq. and L. Renee Green, Esq. (Counsel) to withdrawal as counsel for Plaintiff, ROBERT "SONNY" WOOD, an individual, and ACCESS MEDICAL, LLC, a Delaware Limited Liability Corporation.

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1 This Motion is made and based upon the Memorandum of Points and Authorities
2 submitted herewith, Local Rule IA 11-6 and (e), the Declaration of Martin J. Kravitz, Esq.
3 attached hereto, and the pleadings and papers on file herein.

4 DATED this 22nd day of November, 2021.

5 KRAVITZ SCHNITZER JOHNSON
6 WATSON & ZEPPENFELD, CHTD.

7 By: /s/ Martin J. Kravitz, Esq.

8 MARTIN J. KRAVITZ, ESQ.
9 Nevada Bar No. 83
10 L. RENEE GREEN, ESQ.
11 Nevada Bar No. 12755
12 8985 So. Eastern Avenue, Suite 200
13 Las Vegas, Nevada 89123
14 *Attorney for Defendants*

12 **DECLARATION OF MARTIN J. KRAVITZ, ESQ.**

13 I, Martin J. Kravitz, hereby declare under penalty of perjury as follows:

14 1. I am Senior Partner in the law firm of Kravitz Schnitzer Johnson Watson &
15 Zeppenfeld, Chtd., formerly known as Kravitz, Schnitzer & Johnson, Chtd.

16 2. I am knowledgeable about all matters set forth in this Declaration and know them
17 to be true, except where stated upon information and belief, and in those instances I believe them
18 to be true.

19 3. This firm has been co-counsel in this matter with Jordan P. Schnitzer, Esq.,
20 representing the Defendants, ROBERT "SONNY" WOOD, and ACCESS MEDICAL, LLC.
21 When the Nevada Supreme Court accepted the Certified Question in late 2019, it was our intent
22 to disassociate as counsel. On January 21, 2020, a Stipulation of Change of Counsel to remove
23 the Martin J. Kravitz, Esq. and L. Renee Green, Esq. was filed in the Nevada Supreme Court.

24 4. After the Nevada Supreme Court rendered its Decision regarding the Certified
25 Question, our firm monitored this District Court case but had no participation in preparing any
26 pleadings, discovery or other any documents regarding this matter. All work on behalf of
27 Plaintiff has been handled solely by Jordan P. Schnitzer of The Schnitzer Law Firm.

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5. L. Renee Green, Esq. has now left my firm. I hereby request the Court grant the Motion to Withdraw as Counsel for Defendants, and remove me and L. Renee Green from the service list.

6. There is no prejudice in granting this Motion to Withdraw as Defendants will continue to be represented by Jordan P. Schnitzer, Esq.

I declare under penalty of perjury the foregoing is true and correct.

DATED this 22nd day of November, 2021.

/s/ Martin J. Kravitz
MARTIN J. KRAVITZ

MEMORANDUM OF POINTS AND AUTHORITIES

The United States District Court Local Rules IA 11-6 provides that an attorney may withdraw from representation of a client under certain circumstances. Specifically, Local Rule IA 11-6(b) states:

If an attorney seeks to withdraw after appearing in a case, the attorney must file a motion or stipulation and serve it on the affected client and opposing counsel. The affected client may, but is not required to, file a response to the attorney's motion within 14 days of the filing of the motion, unless the court orders otherwise.

Local Rule IA 11-6(e) further provides: "Except for good cause shown, no withdrawal or substitution will be approved if it will result in delay of discovery, the trial, or any hearing in the case."

Good cause exists to allow Martin J. Kravitz, Esq. and L. Renee Green, Esq. to withdraw as co-counsel for Defendants as outlined in the Declaration of Martin J. Kravitz, Esq. There will be no delay in the proceeding as Jordan P. Schnitzer, Esq. will remain counsel for Defendants.

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CONCLUSION

Based upon the foregoing, Martin J. Kravitz, Esq. and L. Renee Green, Esq. respectfully request that this Court grant their Motion to Withdraw as counsel for Defendants, ROBERT “SONNY” WOOD, and ACCESS MEDICAL, LLC.

DATED this 22nd day of November, 2021.

KRAVITZ, SCHNITZER & JOHNSON, CHTD.

By: /s/ Martin J. Kravitz, Esq.

MARTIN J. KRAVITZ, ESQ.
Nevada Bar No. 83
L. RENEE GREEN, ESQ.
Nevada Bar No. 12755
8985 So. Eastern Avenue, Suite 200
Las Vegas, Nevada 89123
Attorney for Defendants

Order

IT IS ORDERED that ECF No. 161 is DENIED without prejudice for failure to comply with the Local Rules and serve the affected clients.

IT IS SO ORDERED

DATED: 12:52 pm, November 23, 2021



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

KRAVITZ SCHNITZER JOHNSON
WATSON & ZEPPENFELD, CHTD.
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CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of November, 2021, pursuant to Local Rule 5.1, I serviced the foregoing **MOTION AND PROPOSED ORDER TO WITHDRAW AS COUNSEL OF RECORD**, via the Court's CM/EMF electronic filing system addressed to all parties on the e-service list, as follows:

SELMAN BREITMANN LLP
3993 Howard Hughes Parkway, Suite 200 Las Vegas, NV 89169
Telephone: 702.228-7717
Attorneys for Defendant
NAUTILUS INSURANCE COMPANY
(erroneously sued as Nautilus Insurance Group)

/s/ Cynthia Lowe
An employee of Kravitz Schnitzer Johnson
Watson & Zeppenfeld, Chtd.